

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

NATALIE REESER,

Plaintiff,

v.

Case No.: 2:14-cv-11916-GCS-MJH

Hon. George Caram Steeh  
Magistrate Judge Michael Hluchaniuk

HENRY FORD HOSPITAL,

Defendant.

---

**MILLER COHEN, P.L.C.**

Keith D. Flynn (P74192)

Ada A. Verloren (P57541)

*Attorneys for Plaintiff*

600 W. Lafayette Blvd., 4<sup>th</sup> Floor  
Detroit, MI 48226-0840

(313) 964-4454 Phone

(313) 964-4490 Fax

[kflynn@millercohen.com](mailto:kflynn@millercohen.com)

[averloren@millercohen.com](mailto:averloren@millercohen.com)

---

**VARNUM LLP**

Terrence J. Miglio (P30541)

Barbara E. Buchanan (P55084)

*Attorneys for Defendant*

39500 High Pointe Blvd., Suite 350  
Novi, MI 48375

(248) 567-7828 Phone

(248) 567-7423 Fax

[tjmiglio@varnumlaw.com](mailto:tjmiglio@varnumlaw.com)

[bebuchanan@varnumlaw.com](mailto:bebuchanan@varnumlaw.com)

---

**STIPULATED ORDER TO TAKE DISCOVERY DEPOSITIONS**  
**AFTER THE DISCOVERY CUTOFF**

Plaintiff Natalie Reeser and Defendant Henry Ford Hospital stipulate as follows:

Currently, the deadline for discovery is April 6, 2015, pursuant to Dkt. No.

22. Plaintiff noticed and subpoenaed Jill Hood to appear for her deposition on March 23, 2015. This date was re-noticed for March 27<sup>th</sup> pursuant to an agreement

between the attorneys to instead depose Ms. Reeser on March 23<sup>rd</sup>. Ms. Hood's deposition must be rescheduled because she is no longer available on March 27<sup>th</sup>.

Plaintiff's deposition was taken on March 23<sup>rd</sup>. Plaintiff agreed to continue the deposition for the sole purpose of examining Plaintiff regarding documents and other items that she intended to produce after her deposition.

Consequently, the parties stipulate that Ms. Hood's discovery deposition and Plaintiff's continued deposition will take place after the close of discovery and that the depositions shall be governed by and used for all purposes allowed under the Federal Rules of Civil Procedure. Plaintiff and Ms. Hood will appear for their depositions at a mutually agreed upon time. Plaintiff may subpoena Ms. Hood for her deposition after the close of discovery. Defendant's counsel will accept service of the subpoena on Ms. Hood's behalf via First Class mail.

**IT IS SO ORDERED** that Plaintiff will appear for her continued deposition at a mutually agreeable time after the close of discovery for the sole purpose of examination regarding documents and items produced after her deposition and that the depositions shall be governed by and used for all purposes allowed under the Federal Rules of Civil Procedure.

**IT IS FURTHER ORDERED** that Ms. Hood will appear for her discovery deposition that will take place at a mutually agreeable time after the close of discovery, that the depositions shall be governed by and used for all purposes

allowed under the Federal Rules of Civil Procedure, and that Plaintiff may subpoena Ms. Hood to compel her attendance even after the close of discovery.

**IT IS FURTHER ORDERED** that Defendant's counsel will accept service of the subpoena on Ms. Hood's behalf via First Class mail.

Dated: April 20, 2015

  
\_\_\_\_\_  
HON. GEORGE CARAM STEEH

**STIPULATED AS TO FORM AND SUBSTANCE:**

**MILLER COHEN P.L.C.**

By: /s/Keith D. Flynn  
Keith D. Flynn (P74192)  
Ada A. Verloren (P57541)  
*Attorneys for Plaintiff*  
600 W. Lafayette Blvd., 4<sup>th</sup> Floor  
Detroit, MI 48226-0840  
(313) 964-4454 Phone  
(313) 964-4490 Fax  
[kflynn@millercohen.com](mailto:kflynn@millercohen.com)  
[averloren@millercohen.com](mailto:averloren@millercohen.com)

**VARNUM LLP**

By: /s/Terrence J. Miglio (w/consent)  
Terrence J. Miglio (P30541)  
Barbara E. Buchanan (P55084)  
*Attorneys for Defendant*  
39500 High Pointe Blvd., Suite 350  
Novi, MI 48375  
(248) 567-7828 Phone  
(248) 567-7423 Fax  
[tjmiglio@varnumlaw.com](mailto:tjmiglio@varnumlaw.com)  
[bebuchanan@varnumlaw.com](mailto:bebuchanan@varnumlaw.com)

DATED: April 10, 2015